



## FIBRE BOX ASSOCIATION

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Mr. Mark Friedrichs  
PI-40  
Office of Policy and International Affairs  
U.S. Department of Energy  
Room 1E190  
1000 Independence Ave., S.W.  
Washington, DC 20585  
[1605bguidelines.comments@hq.doe.gov](mailto:1605bguidelines.comments@hq.doe.gov)

**RE: Comments. Revised, Interim Final,  
General Guidelines for the Voluntary  
Reporting of Greenhouse Gases (1605(b))  
Program  
RIN Number 1901-AB11**

Dear Mr. Friedrichs:

In response to your request for comments in the Federal Register of March 24, 2005 on the referenced subject matter, we are submitting this letter to you on behalf of the Fibre Box Association (FBA). We have a great interest in the contents of the revised guidelines for voluntary reporting of greenhouse gas emissions, sequestration and emission reductions.

The FBA is the manufacturer's trade association representing and serving the corrugated industry in the United States. Our industry manufactures and markets corrugated and paperboard products consisting of corrugated paperboard (combined board) as well as packaging and shipping containers. There are approximately 600 corrugating plants in the United States and over 825 corrugated board converting plants, manufacturing corrugated paperboard containers, partitions, sleeves, display stands and other types of corrugated articles. The FBA is made up of large and small operators with a wide spectrum of ownership and entrepreneurial activities, representing over 90% of the corrugated production in the United States.

We appreciate the efforts made by the developers of the general guidelines to reflect many comments in prior submissions that have improved on the original general

guidelines. FBA endorses Georgia-Pacific's comments and wish to emphasize several points.

## **1. Responsibility for Reporting on Sequestration**

A troublesome aspect of the guidelines is the unintended but nevertheless real neglect of the manufacturing sector in allocating responsibility for reporting either carbon reductions or avoided emissions derived from the manufacturing of its products and related actions. Basically, for the biogenic products manufacturing sector it is how the erroneous interpretation of 300.8(k) of the responsibility to report reductions by sequestration deprives the forest or agricultural product manufacturer of the right to report reductions. Other sections in the guidelines like TG 2.4.4.2 also reflect this erroneous approach. Regardless if unintended, this erroneous interpretation then sets a precedent of de facto discrimination against the manufacturing sectors not only about carbon sink reduction issues but also about other representations of reductions such as avoided emissions.

One of the concerns of course is the anti-competitive trade issue since those manufacturing entities that also own timberland will obtain a preferential treatment against their competitors without timber and that depend on their supplies.

Reductions of GHG in carbon pools have to do with the increase in the carbon stock in that pool and not where the natural process of sequestration first occurred. It is the decision of the entity to increase the pool that makes the reduction. A harvested tree is indeed an example of a decision by the timber owner to reduce, not to increase, the carbon pool at the forest site. This erroneous and confusing concept and approach, expressed in 308 (k) and elsewhere such as TG 2.4.4.2, creates an inequity to the forest products manufacturing sector which extends to other sectors as shown at the second day of the workshops.

The association in the forest industry that represents both forestry and manufacturing entities, and those integrated at both ends, have been discussing this situation very carefully and recently the enabling committees decided on recommending the decoupling or "debundling" of the responsibility to report and register. Meaning, the recognition that the product carbon pool will be reported by the manufacturing sector alone. This is perfectly logical and practical since the same association has endorsed the GPCARB or 100-yr model which also has been presented to the rest of the International Council of Forest and Paper Associations, ICFPA. This position will be hopefully reflected in the association comments to the register now that there is an extension in the commenting period.

### **Recommended Solution**

Therefore, we recommend that the manufacturer of the products involved in the calculation of reductions via carbon pools or avoided emissions should be allowed to report and register those reductions as well as avoided emissions. If the manufacturing entity also owns forest it will report product reductions independently and separately of the forest part of the entity.

## **2. Rating Approach**

This element of the technical guidelines is a very questionable artifact in the registry procedures. The entire approach failed to meet the two elemental standards in these classical activities, a) that there is indeed a quantifiable difference in accuracy among the four levels and b) that if such difference is established, the marginal cost in reaching the additional accuracy level is justifiable. These are undeniable requirements and lack of time now is not justification for disregard needed rectifications or deletion. Further, as we move out of the stationary sources where the rating system inadequacies is more egregious, we found that use of emissions defaults is then rated as high as “A” while for the stationary sources it was “D”. This system must be rejected. It is clearly contrary to the principle of accuracy, and its extra dimension, set forth in the technical guidelines. We applaud the recognition made in the principle of accuracy to the extra dimension of cost-benefit. Unfortunately it has not been applied properly.

### **Recommended Solution**

Recognizing the federal investment made in this proposal, a complete abolition of the rating system may not be advisable and we can accept that. But the new version of the guidelines must then recognize at the highest level, the use of peer reviewed emission default calculating tools. Most of the important energy intensive industrial sectors do have calculating tools peer-reviewed and available too at the WRI/WBCSD protocol website or at their own web sites. In Chapter 6 of the WRI/WBCSD’s “The Greenhouse Protocol” there is a very good text about the credible and important role of activity data and calculating tools with default emissions factors. The Protocol urged the use of these recognized tools easily available in the website and others in consideration. The “Calculating Tools” of the paper and wood products industry are now internationally recognized after peer review and we expect them to be posted soon in the website of the greenhouse protocol as they are now elsewhere in the NCASI web site. The currently available calculating tools are listed in Table 3, page 44, of the referenced Greenhouse Protocol lists. They should be added by reference and included as Level “A”, calculating tools. Calculating tools that have not been peer reviewed could then be “C”. A logical calculating tool rating, B or C would be the SEIT tool. We urge this sensible recommendation be incorporated exactly as proposed in the cited reference (WRI/WBCSD, revised edition, March 2004). We also urged that rating levels be reduced to three levels since it would be easier to justify intuitively their separation. Unfortunately, there is insufficient time now for more rigorous studies. Consequently the present “pass or fail” figure for registration should be eliminated. Expressions at the workshops clearly indicated a great number of industrial sectors will not be able to pass with this system. The same is true for the forest products sector.

Respectfully submitted,



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Vice President